

**EMERGENCY MEDICAL NECESSITY EXHIBIT: LETTER FROM DR. JORDAN VAUGHN
REGARDING URGENT HOUSING ACCOMMODATIONS**

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY**

John R. Fouts,
Plaintiff,

v.

Defendants

Case No.: 3:25-CV-00033-BJB

I, **John R. Fouts**, respectfully submit this **Emergency Medical Necessity Exhibit** in support of my request for urgent relief regarding the potential loss of my Housing Choice Voucher, which expires today, January 31, 2025, and the severe health risks posed by the possibility of eviction or abrupt relocation – as Station J-Town, a Vida-Management Property, issued a non-lease renewal without cause on December 4, 2025, as previously exhibited stating end of lease is February 8, 2025, and later a walkthrough document was jammed in my door stating that it would take place February 5, 2025. This is a true emergency situation as noted repeatedly, previously, and ignored.

Attached is a letter from Plaintiff's Long Covid with Microclots and MCAS (Mast Cell Activation Syndrome) treating physician, **Dr. Jordan Vaughn**, which outlines the critical nature of Plaintiff's medical conditions and the **urgent need for stable housing** to prevent a **serious health crisis or crises**.

As set forth in Dr. Vaughn's letter, Plaintiff is currently suffering from multiple debilitating health conditions, including **Long COVID, venous insufficiency, mast cell activation syndrome**, and **other complex medical issues** that severely affect Plaintiff's ability to function on a daily basis. Given the **fragility of Plaintiff's health**, any abrupt displacement from Plaintiff's current residence would not only destabilize Plaintiff's medical care but also exacerbate Plaintiff's symptoms, potentially leading to a **medical crisis or crises** that could have **irreparable consequences as noted in a number of previous filings that have been ignored**.

The letter explicitly underscores that maintaining stable housing is **critical for Plaintiff's health** and the **proper management of Plaintiff's conditions**.

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As **Dr. Vaughn** clearly states, it is unreasonable, inhumane, and potentially dangerous to demand Plaintiff's relocation within such a short timeframe, especially given Plaintiff's **medical fragility** and the **vulnerabilities** Plaintiff faces as a primary caregiver for his child.

This **Emergency Exhibit** is submitted to inform the Court of the **urgent medical necessity** for the **reasonable accommodation** of **stable housing**, in accordance with applicable federal laws, including:

1. **The Americans with Disabilities Act (ADA):** Ensuring **reasonable accommodations** for individuals with disabilities. The denial of reasonable housing accommodations under the ADA creates an imminent risk to Plaintiff's health, as outlined in Dr. Vaughn's letter.
2. **The Fair Housing Act (FHA):** Providing **protections from discrimination** in housing based on disability and mandating **reasonable accommodations**. The failure to provide necessary accommodations under the FHA is both discriminatory and detrimental to Plaintiff's well-being.
3. **Section 504 of the Rehabilitation Act: Prohibiting discrimination** in housing matters for those receiving federal assistance. The refusal to accommodate my housing needs is a violation of this act.
4. **The Violence Against Women Act (VAWA):** Offering **protections** for victims of domestic violence, including safeguards against eviction or retaliation. As a victim of domestic abuse, Plaintiff is entitled to protection from retaliatory actions related to his housing situation.

Additionally, Plaintiff is asserting his **right to reserve ADA accommodations** for any future filings and communications, as this matter significantly impacts my ability to access fair and equitable justice. Plaintiff requests that the Court immediately address the **need for stable housing** in light of the **medically fragile** state described in Dr. Vaughn's letter, and also referred to multiple times in previous letters all ignored.

Plaintiff respectfully requests that this letter be immediately considered as part of Plaintiff's ongoing emergency filings that have all been ignored. Plaintiff emphasizes that the loss of his Housing Choice Voucher, if not immediately addressed by the Court, would **cause irreparable harm** to his health and violate his rights under the **ADA, FHA, Section 504, and VAWA along with others**. The need for swift judicial intervention is paramount to ensure Plaintiff's continued access to stable housing and to avoid **medical crises**.

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Note Regarding Defendants Section:

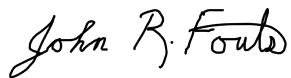
It is important to note that **multiple courts**, including the **9th District Court of Northern California**, the **9th Circuit Court of Appeals**, and the **6th District Court**, have failed to address a **clerical error** regarding the listing of defendants in this case.

Despite repeated efforts by me to correct this error, including attempts to file a **Writ of Mandamus** via email with the **9th Circuit Court of Appeals** on **January 10, 2025**, the **Court has not acknowledged** or responded to this issue.

This ongoing failure to correct the **defendants' listing** is indicative of the **judicial obstruction** that has continually hindered my ability to seek timely relief.

These **errors in the record** have contributed to the ongoing **retaliation** and **obstruction of justice** that I have been subjected to.

Respectfully Submitted,



John R. Fouts

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Case No.: 3:25-CV-00033-BJB

FOUTS, John ROBERT (id #585882, dob: 01/31/1979)



Recipient:

Phone: , Fax:

Fax

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[ID:11740971-H-17217]

Date: 01/31/2025
RE: John Fouts, DOB: 01/31/1979, PT ID #585882

To Whom It May Concern,

I am writing this letter on behalf of my patient, Mr. John R. Fouts, who is currently under my medical care for multiple serious health conditions, including Long COVID, venous insufficiency, and mast cell activation syndrome, among other complex medical concerns. These conditions significantly impact his daily functioning and ability to undertake major life activities, including securing and relocating to a new residence within an unreasonable timeframe.

Due to the chronic and debilitating nature of his health conditions, Mr. Fouts faces substantial limitations in mobility, endurance, and overall well-being. His medical situation necessitates stability in his living environment to manage his symptoms effectively and prevent exacerbation of his conditions. An abrupt displacement from his current residence would pose a severe risk to his health, disrupting essential care, treatment adherence, and symptom management, which could lead to worsening of his condition and potential medical crises.

Furthermore, Mr. Fouts is the primary caregiver for his child, and his medical challenges make it exceedingly difficult for him to rapidly secure alternative housing while continuing to provide necessary care and stability for his child. Forcing an urgent relocation is neither reasonable nor humane, given his documented disabilities. The protections afforded by the Americans with Disabilities Act (ADA), the Fair Housing Act (FHA), Section 504 of the Rehabilitation Act, the Violence Against Women Act (VAWA), and Section 1915(c) of the Social Security Act are critical in ensuring that individuals with disabilities and their dependents are not unlawfully displaced or discriminated against in housing matters.

Given the severity of his condition, I strongly advocate for reasonable accommodations to be granted to Mr. Fouts in accordance with applicable federal and state laws. It is imperative that he be allowed to maintain stable housing, as abrupt eviction or non-renewal of his lease would pose significant harm to his health and well-being.

Please do not hesitate to contact my office should you require any further information or clarification regarding Mr. Fouts' medical condition and the necessity of stable housing for his health.
Sincerely,

A handwritten signature in black ink, appearing to read 'Jordan Vaughn', with a stylized, flowing script.

Electronically Signed by: JORDAN VAUGHN, MD

END OF EXHIBIT